

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

**BRIAN PIERCE,**

**Plaintiff,**

**v.**

**PENNSYLVANIA DEPARTMENT OF  
CORRECTIONS,**

**Defendant.**

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**Civil Action No. 03-173E**

**Judge Sean J. McLaughlin**

**Magistrate Judge Susan Paradise Baxter**

**MOTION FOR EXTENSION OF TIME BY DEFENDANT**

AND NOW, comes the defendant, Pennsylvania Department of Corrections, by attorneys, Thomas W. Corbett Jr., Attorney General, Craig E. Maravich, Deputy Attorney General, Susan J. Forney, Chief Deputy Attorney General, Chief, Litigation Section, and files the following:

1. Plaintiff brings this Title VII employment case against the Pennsylvania Department of Corrections.
2. The defendant is represented by the Pennsylvania Office of Attorney General. This office's litigation section is experiencing a change in personnel which has lead to the reassignment of cases. This case has been reassigned to undersigned counsel.
3. Undersigned counsel is expecting a new family addition in the near future.
4. Defendant respectfully requests an extension of time to file dispositive motions from July 1, 2005 until September 6, 2005, the date Defendant's Pretrial Statement is due.
5. Undersigned counsel contacted plaintiff's counsel to request consent to move back the remaining dates. Plaintiff's counsel did not agree to consent to this motion.
6. This motion is not designed to prejudice any party.


**CONCLUSION**

WHEREFORE, it is respectfully requested the be granted.

Respectfully submitted,

THOMAS W. CORBETT JR.  
Attorney General

By:

  
Craig E. Maravich  
Deputy Attorney General  
Attorney I.D. No. 86219

Office of Attorney General  
564 Forbes Avenue, Manor Complex  
Pittsburgh, PA 15219  
Phone: (412) 565-2794  
Fax: (412) 565-3028

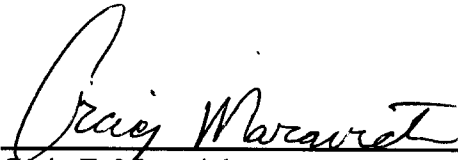
Susan J. Forney  
Chief Deputy Attorney General  
Chief, Litigation Section

Date: June 28, 2005

**CERTIFICATE OF SERVICE**

I, Craig Maravich, Deputy Attorney General for the Commonwealth of Pennsylvania, Office of Attorney General, hereby certify that on June 28, 2005, I caused to be served a true and correct copy of the foregoing document titled *Motion for Extension of time by Defendant* by first-class mail to the following:

Neal A. Sanders, Esq.  
LAW OFFICES OF NEAL SANDERS  
1924 North Main Street Extension  
Butler, PA 16001

  
\_\_\_\_\_  
Craig E. Maravich  
Deputy Attorney General

OFFICE OF ATTORNEY GENERAL  
564 Forbes Avenue, Manor Complex  
Pittsburgh, PA 15219  
(412) 565-2794 phone  
(412) 565-3028 fax

Date: June 28, 2005



COMMONWEALTH OF PENNSYLVANIA  
OFFICE OF ATTORNEY GENERAL

June 28, 2005

TOM CORBETT  
ATTORNEY GENERAL

Western Regional Office  
6<sup>th</sup> Floor, Manor Complex  
564 Forbes Avenue  
Pittsburgh, PA 15219  
Phone: 412-565-2794  
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Clerk's Office  
U.S. District Court for the  
Western District of Pennsylvania  
17 South Park Row  
Erie, PA 16501

Re: **Brian Pierce v. PaDOC**  
**Civil Action No. 03-173E**

Dear Sir or Madam:

Please file the enclosed *Motion for Extension of time by Defendant* in the above-captioned matter.

Thank you,

Sincerely yours,

A handwritten signature in cursive script that reads "Craig Maravich". To the right of the signature is a small, stylized monogram or set of initials, possibly "CMB".

Craig E. Maravich  
Deputy Attorney General

CEM/lml  
cc w/enc.: Neal Sanders, Esq.